

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2019-224-E
DOCKET NO. 2019-225-E

In the Matter of:)	
)	
South Carolina Energy Freedom Act)	DUKE ENERGY CAROLINAS,
(House Bill 3659) Proceeding Related to)	LLC'S AND DUKE ENERGY
S.C. Code Ann. Section 58-37-40 and)	PROGRESS, LLC'S THIRD SET
Integrated Resource Plans for Duke)	OF REQUESTS FOR
Energy Carolinas, LLC and Duke Energy)	PRODUCTION OF DOCUMENTS
Progress, LLC)	AND INTERROGATORIES TO
)	SOUTH CAROLINA SOLAR
)	BUSINESS ALLIANCE,
)	INCORPORATED

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, “Duke Energy” or the “Companies”), by and through their legal counsel, pursuant to Rule 103-833(C) of the Rules of Practice and Procedure of the Public Service Commission of South Carolina, hereby serve South Carolina Solar Business Alliance, Inc. (“SBA”) with the following Third Set of Requests for Production and Interrogatories to be answered under oath on or before twenty (20) days from the date of service.

Further, please take notice that these Requests for Production and Interrogatories are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel should be provided via supplemental discovery responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested documents as they are kept in the usual course of business or to organize and label them to correspond with the categories in the Request. Documents attached to each other should not be separated.

2. In producing Documents, furnish all documents known or available to you, regardless of whether such documents are possessed directly by you or your agents, employees, representatives, investigators, or by your attorneys. All requests for Documents specifically request documents of SBA as well as agents or consultants that SBA has retained to provide expert testimony in this proceeding.

3. If any document otherwise responsive to any Request was, but is no longer, in your possession, subject to your control or in existence, identify each document by listing its author(s) and addressee(s), date, subject matter, whether the document(s) or copies are still in existence (and if so, their locations and the custodians), as well as whether the document is missing or lost, has been destroyed, has been transferred voluntarily to others, or has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization.

4. If a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, and the legal and factual basis for each such claim, and provide a complete description of the information or document being withheld.

5. Unless otherwise stated, the relevant time period for these Requests is from January 1, 2018, until the present.

6. Each Request shall be reproduced at the beginning of the response thereto.
7. Please provide copies of the information responsive to each Request in native electronic working format with all data and formulas intact.
8. Please provide responses to the following data requests electronically. To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. **“Commission”** means the Public Service Commission of South Carolina.
2. **“Communication”** means the transmittal of information in the form of facts, ideas, documents, inquiries, or otherwise, including every discussion, conversation, conference, or telephone call.
3. **“You”** and **“your”** means the South Carolina Solar Business Alliance, Incorporated (“SBA”), South Carolina Solar Business Alliance, Incorporated’s witnesses in this proceeding, including but not limited to, retained witnesses from Solar Energy Industries Association, and Energy and Environmental Economics, Inc., and all of their members, agents, representatives and attorneys.
4. **“SEIA”** means the Solar Energy Industries Association and all of its members, agents, representatives and attorneys
5. **“Dockets”** means Commission Docket Nos. 2019-224-E & 2019-225-E.
6. The term **“document”** is to be construed as broadly as permissible under Rule 34 of the South Carolina Rules of Civil Procedure and includes, but is not limited to, any printed, typewritten, handwritten or otherwise recorded information of whatever

character, including, but not limited to, letters, memoranda, notes, diaries, reports, records, calendars, charts, audio and/or video tapes or discs, and photographs; computer programs or disks; electronic media records, however recorded and maintained, including, but not limited to, electronic mail, voicemail messages, digital photographs and electronically scanned records of any type; recorded observations, statements, conversations or formal affidavits. Any carbon or photocopy of any such materials upon which notations have been made and all drafts are also included.

7. **“Person”** means any natural person or any business, legal, or governmental entity or association.

8. The terms **“related to”** and **“relating to”** or any variation thereof shall be construed to include refer to, summarize, reflect, constitute, contain, embody, mention, show, comprise, evidence, discuss, describe, comment on, concerning, regarding, eluding to, pertaining to, probative of, in connection with, dealing with, in respect of, about, involved, identifying or proving.

9. **“Identify”** when referring to a Person, means to give, to the extent known, the Person’s full name, present or last known address, and when referring to a natural Person, additionally, the present or last known place of employment.

10. **“Identify”** when referring to documents, means to give, to the extent known, the (i) type of Document; (ii) general subject matter; (iii) date of the Document; and (iv) authors, addressees and recipients.

11. **“Identify”** when referring to an oral Communication, means to give, to the extent known, the identity of the speaker and of each Person who was present when the Communication was spoken, and the substance, date, and place of such Communication.

12. **“Integrated Resource Plans” or “IRPs”** refers to DEC’s and DEP’s respective integrated resource plans filed with the Public Service Commission of South Carolina in the Dockets on September 1, 2020.

INTERROGATORIES

Testimony of Arne Olson, Energy and Environmental Economics, Inc.

3-1. Referring to Mr. Olson’s testimony discussing his use of the E3 RECAP model to calculate ELCC values for DEC and DEP, please explain, identify and/or provide the following:

- a. To the extent not already provided in response to Interrogatory 1-24, identify which study year (or years) were included in the RECAP study.
- b. To the extent not already provided in response to Interrogatory 1-24, provide the level of demand response that was included for the summer and winter periods.
- c. Given that the E3 RECAP analysis includes a greater level of demand response as well as the use of 2040 load levels, please describe how resources were adjusted to accommodate these changes and provide the resulting winter and summer reserve margins. Please provide a resource plan table that shows these adjustments.
- d. Please provide the ELCC results with modeling pumped hydro and storage in “preserve reliability” mode versus “economic arbitrage” mode.

ANSWER:

3-2. Referring to “Figure 2: Quantification of ELCC and Diversity Benefits from Solar” on page 18 of Mr. Olson’s testimony, please clarify whether the ELCC values represent summer, winter or annual values.

ANSWER:

3-3. If the ELCC values presented in Figure 2 do not represent winter values, please provide a corresponding figure showing winter values.

ANSWER:

3-4. Referring to “Figure 8: E3 Modeling of Solar ELCC on the Duke Energy Carolina’s System” on page 31 of Exhibit AO-2 to Mr. Olson’s testimony, please clarify whether the ELCC values represent summer, winter or annual values.

ANSWER:

3-5. If the ELCC values presented in Figure 8 do not represent winter values, please provide a corresponding figure showing winter values. Please include all supporting analyses, data and workpapers.

ANSWER:

3-6. As provided in the instructions to these Interrogatories, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, the legal and

factual basis for each such claim, and a complete description of the information or document being withheld.

ANSWER:

REQUESTS FOR PRODUCTION

3-1. Please produce any and all documents identified, referred to, or relied upon in preparing your response to Duke Energy's Third Set of Interrogatories to SBA.

RESPONSE:

3-2. Please produce all analyses, data, and workpapers reviewed or relied upon in preparing any figure in response to Interrogatory 3-3.

RESPONSE:

3-3. Please produce all analyses, data, and workpapers reviewed or relied upon in preparing any figure in response to Interrogatory 3-5.

RESPONSE:

3-4. As provided in the instructions to these Requests, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, the legal and factual basis for each such claim, and a complete description of the information or document being withheld.

RESPONSE:

Dated this 3rd day of March 2021.

/s/ Heather Shirley Smith

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